

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

SYMBOLGY INNOVATIONS LLC,

Plaintiff,

V.

**JOHNSON HEALTH TECH
NORTH AMERICA, INC.,
d/b/a MATRIX,**

Defendant.

CIVIL ACTION NO. 1:18-cv-00687-WMC

JURY TRIAL DEMANDED

PLAINTIFF'S PROOF OF STANDING

Plaintiff Symbology Innovations LLC (“Symbology”) hereby submits proof of Plaintiff’s standing to sue Defendant Johnson Health Tech North America, Inc. for infringement of U.S. Patent Nos. 8,424,752 (the “‘752 patent”); 8,651,369 (the “‘369 patent”); and 8,936,190 (the “‘190 patent”) (collectively the “Patents-In-Suit”).

U.S. Patent application No. 13,170,810 (the “‘810” application) was filed on June 28, 2011. On November 8, 2012, Leigh M. Rothschild, named inventor in the ‘810 application, assigned his right, title and interest in the ‘810 application to Reagan Inventions LLC. *See* attached Exhibit A. On April 23, 2013, the ‘752 patent issued from the ‘810 application. On September 23, 2013, Reagan Inventions LLC assigned its right, title and interest in the ‘752 patent to Ariel Inventions LLC. *See* attached Exhibit B.

U.S. Patent application No. 13,868,071 (the “’071” application) was filed on April 22, 2013. On April 22, 2013, Leigh M. Rothschild, named inventor in the ‘071 application, assigned his right, title and interest in the ‘071 application to Ariel Inventions LLC. *See* attached Exhibit C. On February 18, 2014, the ‘369 patent issued from the ‘071 application.

U.S. Patent application No. 14,181,945 (the “‘945” application) was filed on February 17, 2014. On February 17, 2014, Leigh M. Rothschild, named inventor in the ‘945 application, assigned his right, title and interest in the ‘945 application to Ariel Inventions LLC. *See* attached Exhibit D. On January 20, 2015, the ‘190 patent issued from the ‘945 application.

On January 25, 2015, Ariel Inventions assigned its right, title and interest in the ‘752 patent, the ‘369 patent and the ‘945 application to Symbology Innovations LLC. *See* attached Exhibit E.

Pursuant to the foregoing and supported by the attached exhibits, Plaintiff Symbology has standing to assert patent infringement claims under the Patents-in-Suit in this matter.

Symbology is not aware of any dispute regarding standing at this time.

Dated: November 21, 2018

By: /s/Eugenio J. Torres-Oyola

Eugenio J. Torres-Oyola

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ATTORNEYS FOR PLAINTIFF

SYMBOLGY INNOVATIONS LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document on this 21st day of November, 2018, via the Court's CM/ECF system.

/s/ Eugenio J. Torres-Oyola
Eugenio J. Torres-Oyola